

Options EPA is considering for FIP for Uinta Basin

Option #1: If source has combined emissions >5 tpy have to have controls; so basically follow our minor source program. Emissions based upon PTE, not actuals

Option#2: If a source has a dehydrator with >5 tpy PTE then all other equipment at the site will be pulled in and have to have controls. This is because dehydrators have more reactive VOCs

Option#3: Use the proposed EPA CTGs - issue though is they use a 6 tpy threshold and don't cover dehydrators

Option#4: Follow Denver nonattainment plan where goal is a 'fleet' wide % reduction - basically the source is responsible for inventorying their 'fleet' and then committing to phased reduction in total emissions. This gives the operator the flexibility and control to reduce how they want to.